

DISTRICT COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. CROIX

KEVONGH J. GRANT)	
)	
Plaintiff,)	CASE NO. 1:19-cv-00025
)	
vs.)	(Removed from the Superior
)	Court of the Virgin Islands
APTIM ENVIRONMENTAL AND)	Case No. SX-19-CV-151)
INFRASTRUCTURE, INC., WITT O'BRIEN'S,)	
LLC, ODEBRECHT CONSTRUCTION, INC.,)	ACTION FOR DAMAGES
NATHAN McCANN, ANDREW McCANN,)	
JOHN DOES, JANE DOES, and UNKNOWN)	
CORPORATIONS,)	
)	
Defendants.)	
)	

PLAINTIFF'S NOTICE OF TAKING DEPOSITION

TO: Aptim Environmental and Infrastructure , Inc.
C/O: Adam Moskowitz, Esq.
Dudley, Newman & Feuerzeig, LLP
Law House
P.O. Box 156
St. Thomas, VI. 00804
amoskowitz@dnfvi.com

PLEASE TAKE NOTICE that the Plaintiff Kevongh Grant, pursuant to Rule 30 of the Federal Rules of Civil Procedure, will take the oral deposition of the person named below, at the time, on the date, at the hour, and at the place indicated below:

Deponent: Don Janz

Time and Date: January 13, 2023 at 2:00 pm AST

Location of Deposition: Virtual via Zoom (video recorded/stenographic);
Zoom link to be provided.

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The Defendant Aptim has agreed to produce the above named deponent before a Court Reporter and Notary Public, or before their duly designated representative, who are not of counsel to the parties of interest in the event of the cause.

The oral examination and deposition will continue until completed. The deposition is being taken for the purposes of discovery, for use at trial, or for such other purposes as are permitted under the rules of Court.

Respectfully submitted,

DATED: 12 January 2023

/s/ Diane M. Russell
Diane M. Russell, Esq.
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Kingshill, VI 00850
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 12 day of January 2023, I electronically filed the foregoing *Plaintiff's Notice of Taking Deposition* with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Alex M. Moskowitz, Esq.
Lisa Michelle Komives, Esq.
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/s/ Diane M. Russell